

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

BEN VEAL, )  
Plaintiff, )  
v. ) Civil Action No. 1:14-cv-05810  
RUBBERMAID COMMERCIAL )  
PRODUCTS, LLC, )  
Defendant. )

**JOINT MOTION FOR EXTENSION OF TIME**

Plaintiff Ben Veal (“Veal”) and Defendant Rubbermaid Commercial Products, LLC (“Rubbermaid”) hereby jointly requests an extension of time to complete fact discovery by sixty (60) days, *i.e.*, until **October 11, 2015**, and re-set expert discovery accordingly. In support thereof, the parties states as follows:

The parties are currently in the midst of exchanging written discovery. Fact discovery is currently set to close on August 12, 2015. The parties believe that additional time is needed to complete fact discovery, in particular to schedule and conduct depositions.

The parties propose the following updates:

| <b>Event</b>                        | <b>Current Date</b> | <b>Proposed Date</b> |
|-------------------------------------|---------------------|----------------------|
| Fact discovery to close             | August 12, 2015     | October 11, 2015     |
| Plaintiff's expert reports due      | September 8, 2015   | November 7, 2015     |
| Defendant's expert reports due      | October 7, 2015     | December 6, 2015     |
| All expert discovery to be complete | January 7, 2016     | March 7, 2016        |

WHEREFORE, Veal and Rubbermaid request this Court extend fact discovery by sixty (60) days and re-set expert discovery accordingly.

Dated: July 9, 2015

Respectfully Submitted,

/s/ Michael Haeberle  
Jefferey O. Katz  
Eric J. Chisholm  
Michael D. Haeberle  
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Counsel for Defendant  
RUBBERMAID COMMERCIAL  
PRODUCTS, LLC

**CERTIFICATE OF SERVICE**

I, Tiffany D. Gehrke, an attorney, hereby certify that on July 9, 2015, I caused a copy of the foregoing JOINT MOTION FOR EXTENSION OF TIME to be electronically filed using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Tiffany D. Gehrke

Tiffany D. Gehrke